

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA )  
 ) CRIMINAL NO. 1:13-cr-163  
 v. )  
 ) Count 1: 18 U.S.C. § 1349  
 YEON HAN ) (Conspiracy to Commit Wire Fraud)  
 )  
 Defendant. ) Count 2: 18 U.S.C. § 1349  
 ) (Conspiracy to Commit Wire Fraud)

**CRIMINAL INFORMATION**

THE UNITED STATES ATTORNEY CHARGES THAT:

**BACKGROUND**

1. From in or about 2007 through the present, YEON HAN was the owner and operator of Pacific Realty, a real estate sales and leasing company based in Annandale, Virginia.
2. Bank of America and Virginia Commerce Bank are financial institutions within the meaning of Title 18, United States Code, Section 20, which operated in the Washington D.C. metropolitan area, including in the Eastern District of Virginia. The deposits of these banks were insured by the Federal Deposit Insurance Corporation.

**COUNT 1**  
**(Conspiracy to Commit Wire Fraud)**

3. From in or about 2008 through in or about 2012, in Fairfax County, Virginia within the Eastern District of Virginia, and elsewhere, YEON HAN knowingly, willfully, and unlawfully combined, conspired, confederated and agreed with S.O., H.C., B.K., and others, both known and unknown, to commit offenses against the United States, namely wire fraud, in violation of Title 18, United States Code, Section 1343, by having devised a scheme and artifice to defraud a financial institution, and for obtaining money and property by means of materially false and

fraudulent pretenses, representations, and promises, transmitted and caused to be transmitted by means of wire in interstate or foreign commerce, writings, signs, and for the purpose of executing such scheme and artifice.

4. It was part of the manner and means of HAN's conspiracy that HAN, S.O., B.K., H.C., and others known and unknown defrauded Bank of America and other federally insured financial institutions, as well as buyers and sellers of real property, by creating false HUD-1 settlement statements containing inaccurate or non-existent expenses and credits. These fraudulent HUD-1 settlement statements were electronically transmitted to banks by means of interstate wire. At times throughout the scheme, moreover, HAN communicated with S.O., B.K., and H.C. via telephone to discuss the HUD-1 scheme.

5. Among the hundreds of fraudulent HUD-1 prepared in connection with this scheme, in or around May 2010, OH and WSG handled the settlement for buyer J.S. for her purchase of a residential property located at 5312 Larochelle Drive, Alexandria, Virginia. HAN and her company, Pacific Realty, represented the short seller in the aforementioned transaction. OH and H.C. prepared two different HUD-1 settlement statements for this transaction, both of which were dated May 18, 2010. One HUD-1, which was provided to the short sale lender, Bank of America, reflected a \$7,500 "seller subsidy" payable to the seller, H.L. OH and H.C. prepared a second, different HUD-1, which was provided to the buyer, J.S. The second HUD-1 did not reflect the \$7,500 seller subsidy. Instead, OH fraudulently disbursed the \$7,500 subsidy from J.S.'s purchase to HAN and B.K.

(All in violation of Title 18, United States Code, Section 1349.)

**COUNT 2**  
**(Conspiracy to Commit Wire Fraud)**

6. From in or about 2007 through in or about 2012, in Fairfax County, Virginia within the Eastern District of Virginia, and elsewhere, YEON HAN knowingly, willfully, and unlawfully combined, conspired, confederated and agreed with J.S., and others, both known and unknown, to commit offenses against the United States, namely wire fraud, in violation of Title 18, United States Code, Section 1343, by having devised a scheme and artifice to defraud, and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, transmitted and caused to be transmitted by means of wire in interstate or foreign commerce, writings, signs, and signals for the purpose of executing such scheme and artifice.

7. J.S. is the owner of Washington Cash and Carry, a wholesale food distribution company based in the Washington, D.C. metropolitan area. Washington Cash and Carry is a high volume cash business. J.S. also owns commercial real estate in various partnerships, including at least one property with HAN.


8. It was part of the manner and means this conspiracy that HAN did knowingly and unlawfully conduct more than 50 financial transactions, including check payments and wire transfers, with J.S. HAN knew that these transactions were intended to further J.S.'s knowing and intentional failure to both report income to the appropriate authorities and pay state and federal taxes. Among the checks and wire transfers HAN paid to J.S., on May 14, 2010, HAN caused a \$50,000 wire transfer from her Virginia Commerce Bank Pacific Realty Escrow account ending -1879 to J.S.'s PNC bank account ending -6142. This and other transactions

involved in the scheme, caused writings, signs, and signals to be transmitted by interstate wire in furtherance of the conspiracy.

(All in violation of Title 18, United States Code, Section 1349.)

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Date: 5/15, 2013

with the same number of parameters as the original model, but with a different set of parameters.

1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, 2043, 2044, 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2054, 2055, 2056, 2057, 2058, 2059, 2060, 2061, 2062, 2063, 2064, 2065, 2066, 2067, 2068, 2069, 2070, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2079, 2080, 2081, 2082, 2083, 2084, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2102, 2103, 2104, 2105, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2139, 2140, 2141, 2142, 2143, 2144, 2145, 2146, 2147, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2155, 2156, 2157, 2158, 2159, 2160, 2161, 2162, 2163, 2164, 2165, 2166, 2167, 2168, 2169, 2170, 2171, 2172, 2173, 2174, 2175, 2176, 2177, 2178, 2179, 2180, 2181, 2182, 2183, 2184, 2185, 2186, 2187, 2188, 2189, 2190, 2191, 2192, 2193, 2194, 2195, 2196, 2197, 2198, 2199, 2200, 2201, 2202, 2203, 2204, 2205, 2206, 2207, 2208, 2209, 2210, 2211, 2212, 2213, 2214, 2215, 2216, 2217, 2218, 2219, 2220, 2221, 2222, 2223, 2224, 2225, 2226, 2227, 2228, 2229, 2230, 2231, 2232, 2233, 2234, 2235, 2236, 2237, 2238, 2239, 2240, 2241, 2242, 2243, 2244, 2245, 2246, 2247, 2248, 2249, 2250, 2251, 2252, 2253, 2254, 2255, 2256, 2257, 2258, 2259, 2260, 2261, 2262, 2263, 2264, 2265, 2266, 2267, 2268, 2269, 2270, 2271, 2272, 2273, 2274, 2275, 2276, 2277, 2278, 2279, 2280, 2281, 2282, 2283, 2284, 2285, 2286, 2287, 2288, 2289, 2290, 2291, 2292, 2293, 2294, 2295, 2296, 2297, 2298, 2299, 2300, 2301, 2302, 2303, 2304, 2305, 2306, 2307, 2308, 2309, 2310, 2311, 2312, 2313, 2314, 2315, 2316, 2317, 2318, 2319, 2320, 2321, 2322, 2323, 2324, 2325, 2326, 2327, 2328, 2329, 2330, 2331, 2332, 2333, 2334, 2335, 2336, 2337, 2338, 2339, 2340, 2341, 2342, 2343, 2344, 2345, 2346, 2347, 2348, 2349, 2350, 2351, 2352, 2353, 2354, 2355, 2356, 2357, 2358, 2359, 2360, 2361, 2362, 2363, 2364, 2365, 2366, 2367, 2368, 2369, 2370, 2371, 2372, 2373, 2374, 2375, 2376, 2377, 2378, 2379, 2380, 2381, 2382, 2383, 2384, 2385, 2386, 2387, 2388, 2389, 2390, 2391, 2392, 2393, 2394, 2395, 2396, 2397, 2398, 2399, 2400, 2401, 2402, 2403, 2404, 2405, 2406, 2407, 2408, 2409, 2410, 2411, 2412, 2413, 2414, 2415, 2416, 2417, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2432, 2433, 2434, 2435, 2436, 2437, 2438, 2439, 2440, 2441, 2442, 2443, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2451, 2452, 2453, 2454, 2455, 2456, 2457, 2458, 2459, 2460, 2461, 2462, 2463, 2464, 2465, 2466, 2467, 2468, 2469, 2470, 2471, 2472, 2473, 2474, 2475, 2476, 2477, 2478, 2479, 2480, 2481, 2482, 2483, 2484, 2485, 2486, 2487, 2488, 2489, 2490, 2491, 2492, 2493, 2494, 2495, 2496, 2497, 2498, 2499, 2500, 2501, 2502, 2503, 2504, 2505, 2506, 2507, 2508, 2509, 2510, 2511, 2512, 2513, 2514, 2515, 2516, 2517, 2518, 2519, 2520, 2521, 2522, 2523, 2524, 2525, 2526, 2527, 2528, 2529, 2530, 2531, 2532, 2533, 2534, 2535, 2536, 2537, 2538, 2539, 2540, 2541, 2542, 2543, 2544, 2545, 2546, 2547, 2548, 2549, 2550, 2551, 2552, 2553, 2554, 2555, 2556, 2557, 2558, 2559, 2560, 2561, 2562, 2563, 2564, 2565, 2566, 2567, 2568, 2569, 2570, 2571, 2572, 2573, 2574, 2575, 2576, 2577, 2578, 2579, 2580, 2581, 2582, 2583, 2584, 2585, 2586, 2587, 2588, 2589, 2590, 2591, 2592, 2593, 2594, 2595, 2596, 2597, 2598, 2599, 2600, 2601, 2602, 2603, 2604, 2605, 2606, 2607, 2608, 2609, 2610, 2611, 2612, 2613, 2614, 2615, 2616, 2617, 2618, 2619, 2620, 2621, 2622, 2623, 2624, 2625, 2626, 2627, 2628, 2629, 2630, 2631, 2632, 2633, 2634, 2635, 2636, 2637, 2638, 2639, 2640, 2641, 2642, 2643, 2644, 2645, 2646, 2647, 2648, 2649, 2650, 2651, 2652, 2653, 2654, 2655, 2656, 2657, 2658, 2659, 2660, 2661, 2662, 2663, 2664, 2665, 2666, 2667, 2668, 2669, 2670, 2671, 2672, 2673, 2674, 2675, 2676, 2677, 2678, 26

CRP1 binds to both ends of long (3'-UTR) and short (5'-UTR) mRNAs.

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1. The first step is to identify the problem.
 2. The second step is to define the problem.
 3. The third step is to analyze the problem.
 4. The fourth step is to develop a solution.
 5. The fifth step is to implement the solution.
 6. The sixth step is to evaluate the solution.
 7. The seventh step is to monitor the solution.
 8. The eighth step is to maintain the solution.
 9. The ninth step is to improve the solution.
 10. The tenth step is to document the solution.

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